

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN,

Defendant

Case No.: 1:18-cv-08653-VEC-SDA

**DEFENDANT'S RESPONSE TO
INTEROGATORIES**

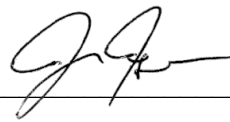
DEFENDANT'S RESPONSE TO INTEROGATORIES

I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

Further, I hereby attest that the attached exhibits are accurate and true copies of source documents as described.

Respectfully submitted

May 15, 2021



Jason Goodman, Defendant, Pro Se

252 7th Avenue Apt 6s
New York, NY 10001
(323) 744-7594

truth@crowdsourcethetruth.org

Request

1. a) Identify the names and addresses of witnesses with knowledge regarding the statements that Defendant purportedly made about Plaintiff, as alleged in the Second Amended Complaint (SAC, ECF No. 88, ¶¶ 68-87) and Supplemental Complaint (Supp. Compl., ECF No. 150, ¶¶ 39-45), and describe the nature of their knowledge.

Response

- 1) a) David Hawkins White Rock BC, Canada was party to the conversation with Defendant that is the focus of the allegations in the Second Amended Complaint (SAC, ECF No. 88, ¶¶ 68-87). Hawkins is aware of this legal action and has direct knowledge of his own statements. Regarding the statements alleged in the Supp. Compl., ECF No. 150, ¶¶ 39-45 it is a difficult question for Defendant to answer properly. Most of the twenty-two recipients of the email are unknown to the Defendant because it was sent in response to an email initiated by the Plaintiff including false and inflammatory allegations against the Defendant published to that group. Plaintiff selected the recipients and in cases where email addresses do not reflect the recipients actual name, the identity of the recipient is unknown to Defendant. One of the recipients is Dr. Anthony Fauci, who is known to the Defendant, but his address and the nature of his knowledge about the alleged statements is unknown to Defendant. FBI special agent Britney Custer is also known to Defendant. This is the agent Defendant spoke with for over 2 hours about Plaintiff and Plaintiff's associates stalking and harassing of Defendant. Special Agent Custer's address and the nature of her knowledge of the allegations and this legal action are unknown to Defendant. Collin Sullivan, is the chief legal counsel for Patreon located at 600 Townsend St #500, San Francisco CA. He has received numerous emails from the

1 Plaintiff and is aware of this ongoing legal action. Sullivan's specific knowledge of these
2 allegations is unknown to Defendant. Defendant is aware of Corean Elizabeth Stoughton
3 but has never met her and cannot confirm her identity, location, or scope of her
4 knowledge of this action. Stoughton is aware of this legal action and has first-hand
5 knowledge of her own actions related to allegations pertaining to her. George Webb
6 Sweigert is Plaintiff's brother and former associate of the Defendant. Defendant does not
7 know Webb's address or location. Webb is aware of this legal action and has first-hand
8 knowledge of his own actions regarding allegations pertaining to him.
9

10 **Request**

- 11
- 12 1) b. Identify the names and addresses of witnesses with knowledge regarding
13 Defendant's use of Plaintiff's name and picture for purposes of advertising or trade, as
14 alleged in the Second Amended Complaint (SAC ¶¶ 88-110) and Supplemental
15 Complaint (¶¶ 47-50) and describe the nature of their knowledge.
16

17 **Response**

- 18 1) b. The allegations in the Second Amended Complaint (SAC ¶¶ 88-110) and
19 Supplemental Complaint (¶¶ 47-50), refer to Hawkins again and he has first-hand
20 knowledge of his own actions regarding the allegations. The allegations also name
21 Larry Nichols. Nichols died September 27, 2020
22 <https://www.rollerfuneralhomes.com/memorialpage.asp?id=56702&locid=14>. To the
23 best of Defendant's recollection he is not aware of any other witnesses with specific
24 knowledge pertaining to these allegations.
25

26 **Request**

1) c. For the period from June 14, 2015 to the present, identify each Uniform Resource Locator (URL) Internet address used by Defendant to post Plaintiff's name and/or picture.

Response

1) c. Defendant had a channel on YouTube called Jason Goodman that is no longer available. <https://www.youtube.com/channel/UC8Cl9QaRtuW9CNjP7pP4BBQ>.

Defendant had a channel on YouTube called Crowdsourcing the Truth 2 that is no longer available <https://www.youtube.com/watch?v=ltDsVwsD6V4>.

Defendant has a channel on YouTube called Crowdsourcing the Truth 3 (<https://www.youtube.com/channel/UC8UYR0Ex3oXPw1GZ8O--vYw>)

Defendant has a channel on YouTube called Crowdsourcing the Truth 4EVER, (https://www.youtube.com/channel/UCxBOfAHh_wc9mfZUkgUY6KQ)

Defendant has a channel on YouTube called Sunday with Charles (https://www.youtube.com/channel/UChAfFKucq9GNLp0_5G18rIg)

Defendant has a channel on YouTube called David Hawkins' Reverse CSI (<https://www.youtube.com/channel/UCT2iskH0Fkxe3WTLMZsyTZw>).

Defendant has a channel on Patreon.com (<https://www.patreon.com/crowdsourcethetruth>)

Defendant has a channel on SubscribeStar.com.

(<https://www.subscribestar.com/crowdsourcethetruth>)

Defendant had a Facebook Page called Crowdsourcing the Truth, however the page has been removed by Facebook and Defendant cannot recollect the specific URL of that defunct page.

Defendant has a Facebook page titled Crowdsourcethe Truth 2

(<https://www.facebook.com/Crowdsourcethe-Truth-2-102167168636604>)

Defendant has a channel on Twitch.com

(<https://www.twitch.tv/crowdsourcethetruth>)

Defendant has a channel on VK.com (<https://vk.com/public150548350>)

Defendant has a channel on D.live (<https://dlive.tv/CrowdsourcetheTruth>)

Defendant has a channel on Rumble.com (<https://rumble.com/user/csthetruth>)

Defendant has a channel on Odysee.com

(<https://odysee.com/@Crowdsourcethetruth:d>)

Defendant has a channel on LBRY.tv (<https://lbry.tv/@Crowdsourcethetruth:d>)

Defendant has a channel on Bitchute.com called Crowdsourcethe Truth

(<https://www.bitchute.com/channel/m3l8rAMF26gt/>)

Defendant has a channel on Bitchute called Crazy_Dave

(<https://www.bitchute.com/channel/z2Uf9iOV7Qym/>). This channel is used as an evidence repository to store videos made by the Plaintiff and deleted by the Plaintiff. As described in these pleadings previously, in the videos Plaintiff makes public declarations against his own interest, detailing his own family's history of mental illness, his vengeful, malicious plans to destroy his nephew's medical career, expose details about the childhood sexual abuse of his brother and other reprehensible things, incriminating himself and rendering himself defamation proof with regard to public statements from third parties including Defendant. Defendant reminds the court that Plaintiff took the extrajudicial step of compelling Bitchute to remove the evidence from Defendant's channel so it cannot be accessed. Defendant retains a copy of the video in his personal files and has produced it to Plaintiff along with other relevant videos.

1 Defendant has a page on gab.ai (<https://gab.com/crowdsourcethetruth>)

2 Defendant has a page on parler.com (<https://parler.com/#/user/csthetruth>)

3 Defendant has a page on minds.com

4 (<https://www.minds.com/crowdsourcethetruth/>)

5 Defendant has a page on Redbubble.com

6 (<https://www.redbubble.com/people/csthetruth/shop>)

7 During the time frame in question the Defendant also had a channel on Periscope,
8 a video sharing platform operated by Twitter. Twitter terminated Defendant's Periscope channel
9 in the beginning of 2021 reporting the service would cease in March of 2021. Periscope remains
10 active but Twitter has terminated Defendant's account. (<https://www.periscope.tv/csthetruth>)

11 It is difficult for Defendant to recall all the social media platforms that have come
12 and gone in the described period. There may have been other channels operated by Defendant,
13 but many have either ceased operating, have had a substantial change in functionality or offering,
14 or have been abandoned by Defendant due to low viewership or other reasons. For instance,
15 Defendant has a channel on www.brandnewtube.com that has not been utilized by Defendant for
16 months or more simply due to low viewership the poor user interface of the website. In
17 reviewing that channel for this response, it is apparent the business model of the platform has
18 changed. All of Defendants videos have been removed, and although the channel still exists it is
19 empty, and Defendant is now prompted to purchase a paid membership in order to maintain
20 video content on the site (<https://brandnewtube.com/@crowdsourcethetruth>). As further
21 example, during the timeframe in question Defendant operated a channel on www.Steemit.com
22 but that has also been abandoned by Defendant and in reviewing it for this response, Defendant
23 is unable to log in or retrieve the password or search for previously posted content. It is unclear
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1 to Defendant if any of Defendant's content remains on the site. To the best of Defendant's
 2 knowledge, these URLs are the only that contain or did at one time contain content relevant to
 3 Plaintiff's claims. If any additional social media platforms or specific URLs are identified,
 4 Defendant will make his best effort to access those platforms and provide access to whatever
 5 content may be deemed relevant.
 6

7 **Request**

- 8 1) d. For the period from June 14, 2015 to the present, identify each social media
 9 account, including platform and username, used by Defendant to post Plaintiff's name
 10 and/or picture.
 11

12 **Response**

- 13 1) d. YouTube username Jason Goodman
 14 YouTube username Crowdsourcethe Truth 2
 15 YouTube username Crowdsourcethe Truth 3
 16 YouTube username Crowdsourcethe Truth 4EVER
 17 YouTube username Sunday with Charles
 18 YouTube username David Hawkins' Discovery CSI
 19 Patreon Username Crowdsourcethe Truth
 20 SubscribeStar Crowdsourcethe Truth
 21 Facebook username Crowdsourcethe Truth
 22 Facebook username Crowdsourcethe Truth 2
 23 Twitch.com username crowdsourcethetruth
 24 VK.com username Crowdsourcethe Truth
 25 D.live username crowdsourcethetruth
 26
 27
 28

Rumble.com username csthetruth

Odysee.com username crowdsourcethetruth

LBRY.tv username crowdsourcethetruth

Bitchute.com username Crowdsorce the Truth

Bitchute username Crazy_Dave

Periscope username @csthetruth

Gab username csthetruth

Parler username csthetruth

Minds uswername crowdsourcethetruth

Request

- 1) e. For the period from June 14, 2015 to the present, identify each email account used by Defendant to communicate information to others regarding Plaintiff

Response

- 1) e. Defendant's primary email address for matters pertaining to Crowdsorce the Truth is truth@crowdsourcethetruth.org. Defendant can also receive email on truth@crowdsourcethetruth.com and responds to that address as well but does not typically initiate communications from that address. Defendant also uses the email address jason@21stcentury3d.com and due to the functioning of some software programs, occasionally Defendant will inadvertently communicate Crowdsorce the Truth related business via that address. For a brief period of time, Defendant also had an encrypted email address jasongoodman72@protonmail.com. This email address was created at the urging of Plaintiff's brother Webb and Webb's associated Oakey Marshall Richards. Richards repeatedly comes up in Plaintiff's pleadings regarding

1 the incident in the Port of Charleston. At some time in 2017 or 2018 to the best of
2 Defendant's recollection, Defendant terminated the use of
3 jasongoodman72@protonmail.com. Proton mail offers encrypted email that purports
4 to offer the user an extreme level of privacy and security. The tradeoff however is
5 less convenience for the user. At some point after halting communications with
6 Richards and Webb, Defendant forgot the password and could no longer access to
7 jasongoodman72@protonmail.com. When a user forgets their Proton Mail password,
8 they can no longer access the account unless they initiate a password reset process
9 which deletes all existing messages in the account. Defendant cannot recall if any
10 communications related to Plaintiff took place over Protonmail, but all proton mail
11 communications are no longer accessible to Defendant. To the best of Defendant's
12 recollection, these are the only email addresses used to conduct Crowdsourcethe
13 Truth business which would include any communications related to Plaintiff.
14
15
16

17 Request

- 18 1) f. Provide the location and a general description of documents or electronically stored
19 information—including writings, drawings, graphs, charts, photographs, sound
20 recordings, images and other data or data compilations—in the possession, custody or
21 control of Defendant regarding Plaintiff.
22

23 Response

- 24 1) f. In addition to the locations and websites identified by Plaintiff in his various
25 pleadings, documents and electronically stored information—including writings,
26 drawings, graphs, charts, photographs, sound recordings, images and other data or
27 data compilations—in the possession, custody or control of Defendant regarding
28

Plaintiff are stored on the personal Macbook Pro laptop computer owned by Defendant and one backup hard drive owned by Defendant.

Request

2. No later than January 15, 2021, Defendant shall produce to Plaintiff the following documents for the period from June 14, 2015 to the present:

- a. All documents and communications between Defendant and Patreon.com (or its representatives) regarding Plaintiff.
- b. All documents and communications between Defendant and any law enforcement agency regarding Plaintiff.
- c. All emails sent or received by Defendant regarding Plaintiff.
- d. All documents regarding any social media posts by Defendant that refer to Plaintiff and/or display his picture.
- e. All documents regarding Plaintiff's purported participation in what Plaintiff refers to as the "Port of Charleston, S.C. dirty bomb hoax of June 14, 2017."

Response

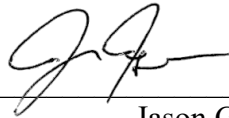
2.
 - a. Defendant searched all communications with Patreon.com and its representatives including additional specific searches for communications with Jack Conte and Colin Sullivan (which may have yielded duplicates) and produced all communications regarding Plaintiff in a printed bates numbered document sent via USPS to General Delivery Nevada City CA, 95959 on May 15, 2021

- b. To the best of Defendant's recollection, no documents exist that are responsive to this request all contact between Defendant and law enforcement has been via telephone or in person.
- c. Defendant searched all emails for the term Sweigert and the results in a printed bates numbered document sent via USPS to General Delivery Nevada City CA, 95959 on May 15, 2021
- d. The Defendant has included a USB memory stick containing 46.8GB of video data. Defendant has made his best effort to assemble all posts about Plaintiff, however Defendant objects to the broad language of the question as written. It is virtually impossible for Defendant to recall all social media posts from four years ago. Defendant will fully cooperate and make further best efforts to provide access to any other social media or another posts should Plaintiff become aware of such posts. Defendant can make a duplicate USB memory stick with the 46.8GB of video data available to chambers if it should please the court.
- e. Defendant has already included as evidence the book written by Plaintiff containing his own fictional account of events pertaining to the Port of Charleston event. (https://www.amazon.com/Report-Charleston-Dirty-Social-Liability/dp/1717056792/ref=sr_1_1?dchild=1&keywords=dave+sweigert&qid=1612627862&sr=8-1) Numerous additional documents exist or have existed but are not currently in Defendant's possession including a large number of videos and social media posts created by the Plaintiff that have since been deleted or otherwise rendered inaccessible to Defendant by deliberate actions of the Plaintiff or indirectly through the actions of third parties.

I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

Signed this 15th day of May 2021

Respectfully submitted,



Jason Goodman, Defendant, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
(323) 744-7594

truth@crowdsourcethetruth.org

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FOR THE SOUTHERN DISTRICT OF NEW YORK

D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN,

Defendant

Case No.: 1:18-cv-08653-VEC-SDA

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I certify that on the 15th day of May 2021, I served true and accurate copies of the foregoing document to the following persons, either by deposit in the U.S. Mail, addressed as follows and with the correct first-class postage affixed thereto, or by deposit in the designated courthouse mailbox, or by hand-delivery as indicated below

Name: Pro Se Section of the U.S. District Court Southern District of New York

Served by

☒ Temporary e-mail filing

☐ Deposit in the designated courthouse mailbox

☐ By deposit in the U.S. Mail addressed as follows:

Name: D. George Sweigert (aka David George Sweiger, aka Dave Acton)

☐ Hand-delivery

[] Deposit in the designated courthouse mailbox

[X] By deposit in the U.S. Mail addressed as follows:

D. George Sweigert

General Delivery

Nevada City, CA 95959

I hereby attest that the pleadings herein are accurate and true under penalties of perjury.



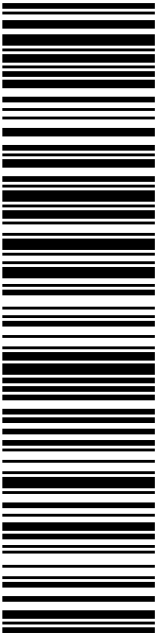
Further, I hereby attest that the attached exhibits are accurate and true copies of source documents as described.

Signed this 15th day of May 2021





Jason Goodman, Defendant, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
(323) 744-7594

truth@crowdsourcethetruth.org

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JASON GOODMAN 21ST CENTURY 3D 252 7TH AVE NEW YORK NY 10001-7326		Scheduled Delivery Date: 05/17/21 0007	
SIGNATURE REQUIRED SCHEDULED DELIVERY 3:00 PM		G000	
SHIP TO: DAVID GEORGE SWEIGERT GENERAL DELIVERY NEVADA CITY CA 95959-9999			
USPS SIGNATURE TRACKING #  9481 7036 9930 0039 9520 76			

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No Delivery <input type="checkbox"/> Saturday <input checked="" type="checkbox"/> Sunday/Holiday	Contents Value	COD Fee	Ins. Fee \$0.00	Signature Service: SIGNATURE REQUIRED	
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FROM: JASON GOODMAN 21ST CENTURY 3D 252 7TH AVE NEW YORK NY 10001-7326	TO: DAVID GEORGE SWEIGERT GENERAL DELIVERY NEVADA CITY CA 95959-9999
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